

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

NOTICE

Debtor has filed papers with the court to incur new debt.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the Court grant the Motion, or if you want the court to consider your views on the Motion, then on or before 21 days, you or your attorney must:

File with the court a written request for a hearing at:

U.S. Bankruptcy Clerk
U.S. Bankruptcy Court
Thad Cochran U.S. Courthouse
501 E. Court St., Suite 2.300
Jackson, MS 39201

If you mail your request to the court for filing, you must mail it early enough so the court will receive it on or before the date state above.

You must also mail a copy to the debtors' attorney:

Thomas C. Rollins, Jr.
The Rollins Law Firm, PLLC
P.O. Box 13767
Jackson, MS 39236
(601) 500-5533

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief, which shall sustain this Motion to Incur New Debt.

Date: July 29, 2025

Signature: /s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr. (MSBN 103469)
The Rollins Law Firm, PLLC
P.O Box 13767
Jackson, MS 39236
601-500-5533
trollins@therollinsfirm.com

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

IN RE: Eric Mathew Kunjappy, Debtor Case No. 23-02043-JAW
CHAPTER 13

MOTION TO INCUR NEW DEBT

COMES NOW, Debtor, by and through counsel, and moves this Court to allow Debtor to incur new debt, and in support thereof, would show the Court as follows:

1. Debtor filed a voluntary petition for relief under Chapter 13 of the Bankruptcy Code on 09/05/2023.
 2. Debtor is paying approximately 3.04% to General Unsecured Debts through the plan.
 3. Debtor plans to attend the University of Southern Mississippi to continue his education to obtain a bachelor's degree in cybersecurity. He intends to enroll in the Fall 2025, Spring 2026, Fall 2026, and Spring 2027 semesters.
 4. Debtor is currently employed as an Administrative Support IV employee with the Mississippi Department of Environmental Quality, earning approximately \$41,600 per year. By obtaining a bachelor's degree in cybersecurity, he could potentially increase his annual income to around \$90,000.
 5. Debtor seeks to obtain financial aid in the amount of \$7,000.00 at an interest rate of 4.2 percent, to be disbursed in approximately \$1,750.00 increments per semester to complete his cybersecurity degree.
 6. Debtor will repay this debt directly to the lender in accordance with the terms of their agreement.

WHEREFORE, Debtor prays for an Order granting the above requested relief and any additional relief as may be just and proper.

Respectfully submitted

/s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr. (MS Bar No. 103469)
The Rollins Law Firm, PLLC
P.O. Box 13767
Jackson, MS 39236
601-500-5533

CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., certify that an accurate copy of the Motion to Incur New Debt was filed on CM/ECF this day and that the Chapter 13 Case Trustee and U.S. Trustee are registered to receive electronic notice in this case. The date of said notice is reflected on the Docket.

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.

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4 **UNITED STATES BANKRUPTCY COURT**
5 **SOUTHERN DISTRICT OF MISSISSIPPI**

6 IN RE:
7 ERIC MATHEW KUNJAPPY

6 CASE NO: 23-02043-JAW
7 **DECLARATION OF MAILING**
8 **CERTIFICATE OF SERVICE**
9 Chapter: 13

10
11 On 7/29/2025, I did cause a copy of the following documents, described below,

12 Notice and Motion to Incur New Debt

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18 to be served for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with
19 sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and
20 incorporated as if fully set forth herein.

21 I caused these documents to be served by utilizing the services of BK Attorney Services, LLC d/b/a certificateofservice.
22 com, an Approved Bankruptcy Notice Provider authorized by the United States Courts Administrative Office, pursuant to
23 Fed.R.Bankr.P. 9001(9) and 2002(g)(4). A copy of the declaration of service is attached hereto and incorporated as if
fully set forth herein.

24 Parties who are participants in the Courts Electronic Noticing System ("NEF"), if any, were denoted as having been
25 served electronically with the documents described herein per the ECF/PACER system.

26 DATED: 7/29/2025

27
28 /s/ Thomas C. Rollins, Jr.
29 Thomas C. Rollins, Jr. 103469
30 Attorney at Law
31 The Rollins Law Firm
32 702 W. Pine Street
33 Hattiesburg, MS 39401
34 601 500 5533
35 trollins@therollinsfirm.com

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:

ERIC MATHEW KUNJAPPY

CASE NO: 23-02043-JAW

**CERTIFICATE OF SERVICE
DECLARATION OF MAILING**

Chapter: 13

On 7/29/2025, a copy of the following documents, described below,

Notice and Motion to Incur New Debt

were deposited for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

The undersigned does hereby declare under penalty of perjury of the laws of the United States that I have served the above referenced document(s) on the mailing list attached hereto in the manner shown and prepared the Declaration of Certificate of Service and that it is true and correct to the best of my knowledge, information, and belief.

DATED: 7/29/2025



Miles Wood
BK Attorney Services, LLC
d/b/a certificateofservice.com, for
Thomas C. Rollins, Jr.
The Rollins Law Firm
702 W. Pine Street
Hattiesburg, MS 39401

USPS FIRST CLASS MAILING RECIPIENTS:

Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

CASE INFO

LABEL MATRIX FOR LOCAL NOTICING
 NCRS ADDRESS DOWNLOAD
 CASE 23-02043-JAW
 SOUTHERN DISTRICT OF MISSISSIPPI
 TUE JUL 29 17-6-48 PST 2025

EXCLUDE

(U) BANK OF AMERICA NA
 PO BOX 31785

BANK OF AMERICA NA
 PO BOX 31785
 TAMPA FL 33631-3785

EXCLUDE

(U) MEMBERS EXCHANGE CREDIT UNION

VELOCITY INVESTMENTS LLC BY AIS
 INFOSOURCE
 4515 N SANTA FE AVE
 OKLAHOMA CITY OK 73118-7901

EXCLUDE

US BANKRUPTCY COURT
 THAD COCHRAN US COURTHOUSE
 501 E COURT STREET
 SUITE 2300
 JACKSON MS 39201-5036

BANK OF AMERICA NA
 CO BANK OF AMERICA NA
 PO BOX 31785
 TAMPA FL 33631-3785

BANK OF AMERICA
 ATTN BANKRUPTCY
 4909 SAVARESE CIRCLE
 TAMPA FL 33634-2413

(P) CAVALRY PORTFOLIO SERVICES LLC
 500 SUMMIT LAKE DR
 STE 400
 VALHALLA NY 10595-2321

CAVALRY SPV I LLC AS ASSIGNEE OF
 CITIBANK NATHE HOME DEPOT
 PO BOX 4252
 GREENWICH CT 06831-0405

CITI CARDBEST BUY
 PO BOX 790040
 ST LOUIS MO 63179-0040

CITIBANK
 PO BOX 6497
 SIOUX FALLS SD 57117-6497

CITIBANK NA
 5800 S CORPORATE PL
 SIOUX FALLS SD 57108-5027

DISCOVER BANK
 DISCOVER PRODUCTS INC
 PO BOX 3025
 NEW ALBANY OH 43054-3025

DISCOVER FINANCIAL
 PO BOX 30939
 SALT LAKE CITY UT 84130-0939

GOLDMAN SACHS BANK USA
 ATTN BANKRUPTCY
 PO BOX 70379
 PHILADELPHIA PA 19176-0379

GOLDMAN SACHS BANK USA
 BY AIS INFOSOURCE LP AS AGENT
 4515 N SANTA FE AVE
 OKLAHOMA CITY OK 73118-7901

(P) JEFFERSON CAPITAL SYSTEMS LLC
 PO BOX 7999
 SAINT CLOUD MN 56302-7999

JOHN S SIMPSON ESQ
 SIMPSON LAW FIRM PA
 FOR MEMBERS EXCHANGE CREDIT UNION
 PO BOX 2058
 MADISON MS 39130-2058

LVNV FUNDING LLC
 RESURGENT CAPITAL SERVICES
 PO BOX 10587
 GREENVILLE SC 29603-0587

MARCUS BY GOLDMAN SACH
 ATTN BANKRUPTCY
 PO BOX 45400
 SALT LAKE CITY UT 84145-0400

MEMBERS EXCHANGE CREDIT UNION
 CO SIMPSON LAW FIRM PA
 P O BOX 2058
 MADISON MS 39130-2058

NATALIE BROWN EDQ
 RUBIN LUBLIN LLC
 FOR BANK OF AMERICA NA
 428 NORTH LAMAR BLVD SUITE 107
 OXFORD MS 38655-3221

SYNCHRONY
 ATTN BANKRUPTCY
 PO BOX 955060
 ORLANDO FL 32896-5060

SYNCHRONY BANK
 BY AIS INFOSOURCE LP AS AGENT
 4515 N SANTA FE AVE
 OKLAHOMA CITY OK 73118-7901

TD RETAIL CARD
 ATTN BANKRUPTCY
 PO BOX 100114
 COLUMBIA SC 29202-3114

TD RETAIL CARD SERVICES
 CO CREDITORS BANKRUPTCY SERVICE
 PO BOX 800849
 DALLAS TX 75380-0849

USPS FIRST CLASS MAILING RECIPIENTS:

Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

EXCLUDE

UNITED STATES TRUSTEE
501 EAST COURT STREET
SUITE 6 430
JACKSON MS 39201 5022

EXCLUDE

(D) VELOCITY INVESTMENTS LLC BY AIS
INFO SOURCE
4515 N SANTA FE AVE
OKLAHOMA CITY OK 73118 7901

DEBTOR

ERIC MATHEW KUNJAPPY
126 GREEN OAKS
FLORENCE MS 39073-8492

EXCLUDE

HAROLD J BARKLEY JR
PO BOX 4476
JACKSON MS 39296 4476

EXCLUDE

THOMAS CARL ROLLINS JR
THE ROLLINS LAW FIRM PLLC
PO BOX 13767
JACKSON MS 39236 3767